

***Exhibit L***

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

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TRACY CAEKAERT, and  
CAMILLIA MAPLEY,

Case No.  
CV-20-52-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

Defendants,

ARIANE ROWLAND, and  
JAMIE SCHULZE,

30(b)(6) DEPOSITION  
UPON ORAL EXAMINATION  
OF WILLIAM HASCH AND  
RUSTIN HALEY

Plaintiff,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

Case No.  
CV-20-59-BLG-SPW

Defendants.

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BE IT REMEMBERED, that the 30(b)(6) deposition upon oral examination of WILLIAM HASCH and RUSTIN HALEY, appearing at the instance of the Plaintiffs, was taken at the offices of Fisher Court Reporting, 2711 1st Avenue North, Billings, Montana, on, Wednesday, January 10, 2024, beginning at the hour of 9:09 a.m., pursuant to the Federal Rules of Civil Procedure, before Barbara J. McLean, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public.

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**William Hasch and Rustin Haley 30(b)(6)**

1 Q. And within the contours of your  
2 preparation, your answer is that you don't know  
3 about the document -- the documents that are not  
4 present from that '72 to '93 time period?

5 A. Yes, that's correct.

6 Q. Let's go to -- on [Exhibit 19](#), let's go to  
7 page 7, topic 23. "The practices, policies, and  
8 procedures in place at the Hardin Congregation from  
9 1973 to the present when receiving a complaint  
10 regarding or related to child sexual abuse..."  
11 Okay. I'm going to stop there. And there's more  
12 to the question.

13 So it's three things: "The practices,  
14 policies, and procedures at Hardin from '73 to the  
15 present when receiving a complaint regarding or  
16 related to child sex abuse." [As read.]

17 A. To immediately call the legal department  
18 at the branch.

19 Q. And how was that -- how was that directive  
20 or policy or procedure communicated?

21 A. I think from a letter or from the circuit  
22 overseer. We were told directly. It might have  
23 been in one of those classes, too, but it was known  
24 that you call the legal department.

25 Q. And when you say a letter, who would that

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**William Hasch and Rustin Haley 30(b)(6)**

1 letter have come from?

2 A. Probably from the branch. It would be a  
3 to "All Bodies of Elders" letter.

4 Q. So from 1973 to the present, that policy  
5 has not changed.

6 A. I don't know. That's the policy that's  
7 been in effect since I've been an Elder. And so I  
8 don't know -- I don't know what the policy was in  
9 1973 to '93, '94, whatever it is.

10 Q. Okay. And just to be very clear, on 23,  
11 you're answering on behalf of the Hardin  
12 Congregation. And the question is from '73 to the  
13 present.

14 A. Uh-huh.

15 Q. So what period of time do you know, are  
16 you testifying to?

17 A. Well, from 1973 to present, it has  
18 probably changed a little bit, just like most  
19 things have changed in that period of time.

20 If a complaint regarding sexual abuse  
21 would be brought up, it would be brought up to the  
22 branch as far as I know.

23 Q. And specifically any department within the  
24 branch?

25 A. It would be with our legal department,

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